

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

**RIO GRANDE LNG, LLC.**

**DOCKET NO. CP16-454-000**

**MOTION TO INTERVENE OF  
TOWN OF LAGUNA VISTA, TEXAS**

Pursuant to Rules 212 and 214 of the Federal Energy Regulatory Energy Regulatory Commission's ("Commission") Rules of Practice and Procedure, 18 CFR §§ 385.212 and 385.214 (2007), the TOWN OF LAGUNA VISTA, Texas ("Town") hereby moves to intervene in the above-captioned proceeding.

**I. Background**

Rio Grande LNG earlier filed with the commission an Application for Authorization under Section 3(a) of the Natural Gas Act for authority to site, construct, modify, and operate facilities used for the export of natural gas located in Cameron County, Texas (the "project") in or adjacent to the corporate limits or extra-territorial jurisdiction of the TOWN OF LAGUNA VISTA, Texas.

**II. Motion to Intervene**

**A. Description of the Town**

The Town, is located in Cameron County, Texas along the shores of the Laguna Madre. In 2014, the American FactFinder recorded the Town's population as 3213. As a municipality located adjacent in the vicinity to the proposed project, the Town is directly affected. As a community dependent on tourist spending, the aesthetic appeal of the surrounding area is economically-vital. Town residents employed in the fishing and tourism industries use waters and other natural

environments commercially that may be impacted by the project, while other Town residents use potentially impacted waters and environments for recreational purposes. The Town, including its schools, housing and health care facilities, are located in close proximity to the project site, and subject to potential adverse health and safety impacts, including emissions, dust, noise and light generated by daily operations, as well as technological hazards associated with potential incidents at the project site. The proximity of the project to the Town's transportation infrastructure, including the Brazos Santiago Pass, Gulf Intracoastal Waterway and Port Isabel Ship Channel and Turning Basin, as well as State Highways 100 and 48 expose the Town to potential transportation disruption caused by operations or incidents at the project site. Furthermore, the Town is highly-dependent on revenues collected from property and sales taxes, and any decline in property values or in tourist visits will result in economic harm to the Town. In addition to impacts related to the project's location in relation to the Town, the Town also notes potential adverse impacts by the project on cultural and environmental resources located at or adjacent to the project site, including the potential for takings of West Indian Manatees within the Brazos Santiago Pass and the Brownsville Ship Channel, and impacts upon the Bahia Grande unit of the Laguna Atascosa Wildlife Refuge, which houses endangered species such as the Ocelot, Jaguarundi, and numerous bird and plant species; and which has also been the site of discoveries of Karankawa Indian artifacts. The Town reasonably believes that the project will

impact these precious cultural and environmental resources, which are of significance to Laguna Vista residents. Additionally, the TOWN OF LAGUNA VISTA reserves the right to add or amend elements related to its standing to intervene in this proceeding.

**B. Motion to Intervene**

Based on the above, the Town has a direct and substantial interest in the above docket, and may be directly impacted by the outcome of this proceeding. The Town cannot be adequately represented by any other party and may be adversely affected or bound without opportunity to present its position unless it is permitted to participate in this matter. Moreover, the Town's participation in this proceeding is in the public interest. Accordingly, good cause exists to grant the Town's motion to intervene.

**III. Communications**

All correspondence and communications related to this proceeding should be directed to the following individuals whose names and addresses should be placed on the official service list maintained by the Secretary for this proceeding:

Rolando Vela  
City Manager, Town of Laguna Vista  
122 Fernandez Street  
Laguna Vista, Texas 78578  
Phone: 956-943-1793  
[cm@lvtexas.us](mailto:cm@lvtexas.us)

Ricardo Morado  
Town Attorney, Town of Laguna Vista  
855 W. Price Road  
Brownsville TX 78520  
Phone: 956-542-5666  
[rmorado@roflp.com](mailto:rmorado@roflp.com)

**IV. Conclusion**

Wherefore, for the reasons discussed above, the TOWN OF LAGUNA VISTA, Texas respectfully requests that the Commission grant the city's motion to intervene as a party in the above-captioned proceeding with all of the rights attendant thereto.



Respectfully submitted,

Rolando Vela,

City Manager, Town of Laguna Vista, Texas

Dated: June 22, 2016

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon the applicant at the address listed in the service list maintained by the Secretary for this proceeding, as required by 18 CFR § 385.2010.

Dated in Laguna Vista, Texas this the 22<sup>th</sup> day of June 2016.



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Rolando Vela,  
City Manager, Town of Laguna Vista, Texas  
122 Fernandez Street  
Laguna Vista, Texas 78578